

# WBQP TV - 12, CABLE 50

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"THE STATIONS THAT CARES"

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May 21, 1998

Secretary, Federal Communications Commission  
Room 222  
1919 M Street, NW  
Washington, DC 20554

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MAY 22 1998

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RE: CBA's "Class A" Rule Making Petition.

RM-9260

Dear Secretary,

Find attached the original plus nine copies of our comments to the FCC ruling stated above. We appreciate the opportunity to provide these comments on behalf of the Low Power Television (LPTV) Stations.

We look forward to a positive response from your office concerning this most strategic development in the life of our stations. As a minority LPTV owner, others and myself believe this is a crucial movement in our industry. It will assist us in capturing much needed bank financing and providing a more level playing field in this industry with High Power Televisions Stations.

Your time and effort concerning this matter is greatly appreciated. We thank you in advance of your positive response towards this ruling.

Cordially yours,

*Vernon Watson*

Vernon Watson  
Owner / General Manager  
WBQP TV-12

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Before the  
FEDERAL COMMUNICATIONS COMMISSION

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MAY 22 1993

Washington, D.C. 20554

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In the Matter of )  
  
Petition of the )  
Community Broadcast Association ) **RM-9260**  
For Establishment of a "Class A" )  
Television Service )

To: The Commission -- Mail Stop 1170

COMMENTS OF WBQP TV-12/VERNON WATSON

These Comments are filed by WBQP-TV-12 (Vernon Watson), operator of low power television station WBQP LP Pensacola, Florida

These comments are in support of "Class A" status TV Service.

As an operator of a low power TV station since 1992, it is necessary that the new "Class A" service be established to give LPTV a permanent home. Personal saving financed my TV station because banks and the SBA would not consider loaning money to a business that they considered "temporary." Most investors would not take the low power station concept seriously because it was too risky of an investment with no secured future. Because of this, some low power TV ventures are under-funded and can not perform their mission professionally. It is unreal to believe that the FCC would create a much needed TV service like the low power service and make it secondary. We took the

unused spectrum and made a valuable service as well as provided full utilization of the spectrum. Full power stations could not use it without causing problems to one another. We are asking for full privileges as our counterparts (Full Power Stations) to become "Class A" stations. In fact, LPTV stations are granting service to areas and to special interest groups that full power station can not or are unable to serve.

The biggest threat to LPTV operators is losing our personal investment and perhaps having to go into bankruptcy because some major broadcast group decide they want this particular spectrum now. It goes against the entrepreneurial spirit of this country. The low power stations should have the same equal opportunity to survive or fail as any other broadcast properties. As we speak, the opportunities are heavily weighed toward helping us fail and that problem can be fixed by creating a "Class A" service. When I signed on to be a low power TV operator, Part 74 of the rules only mentioned "secondary status" relating to interference standards of existing full power stations. Now the rules mean "secondary status" to any and all broadcast properties that's comes along, even to those who were licensed after us. "Class A" status will give us more of a level playing field to participate as real players in the broadcast world.


As a minority LPTV operator, I feel it is even more important to protect the LPTV industry by creating a "Class A" service to provide opportunities for minorities and women. Ownership of full power TV stations by minority/women has been low and consistently declining in comparison to the LPTV industry. "Class A" TV stations are an ideal entrant into the TV broadcast industry for minority and persons who traditionally have been excluded as major participants. Since, the LPTV industries have more minority

representation than any other broadcast industry; we need to protect this representation with the CBA proposal. Yet, it is also a deterrent to many minorities because of the so called "secondary status," lack of bank financing, and lack of transmitter power to effectively serve your existing market.

It is my opinion, that transmitter power for "Class A" stations should be limited only to the point necessary to avoid interference to other existing broadcast spectrum. However, I strongly support the CBA's proposal to increase power levels outlined in the CBA's Petition. As a low power VHF operator, it has been a joke and a nightmare to seriously compete in the professional TV business world when your signal only goes out 3 to 4 miles on a good day. Worst yet, our prospective Clients let us know that their CB radio puts out more power than my VHF TV station. Additionally, amateur Ham TV Operators are allowed to use as much power necessary to get their signal from point A to point B. Yet, professional LPTV operators are limited to 10 watts on VHF and 1KW on UHF. I appeal to you to apply "common sense" to this matter and allow this industry to mature. It can be done by supporting the "Class A" stations TV Service for the LPTV industry.

"Class A" status will allow LPTV operators to "cross the bridge into the 21st century" with Digital TV (DTV) and allow for long term planning as well as development for stations and the industry.

Respectfully submitted,  
Vernon Watson  
WBQP TV-12

Signed 

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Date: May 20, 1998